

Review of Light-emitting Diode (LED) Lights and Compliance with the American Recovery & Reinvestment Act (ARRA) Buy America Requirement

Recipients of the Energy Efficiency and Conservation Block (EECBG) Small Cities grants funded by ARRA must comply with the *Buy America* requirement (ARRA Section 1605). *Buy America* requires that all “*iron, steel, and manufactured goods*” used in these projects be produced in the United States. Per “EERE Supply Item Clarification,” March 19, 2010, LED “lamps, fixtures, and supporting components” are manufactured goods, and therefore must comply with the *Buy America* requirement. In addition, the United States Department of Energy (USDOE), which is administering these grants, has confirmed that these products must comply. The USDOE issued “[Nationwide Limited Public Interest Waiver No. 6450-01-P](#)” for LEDs *which expired March 31, 2010*. Therefore, all LED lamps, fixtures, and supporting components purchased with ARRA/EECBG grant funds must comply with *Buy America*. The only exception is for LED traffic lights, arrows, and cross-walk signals (not street lights), which are exempt under the [US DOE Memorandum of Decision](#) issued on February 11, 2010, since no USA manufacturer is available.

To date, twenty Small Cities grantees in Alaska have expressed intent to implement LED lighting conversions. Most communities intend to upgrade street lights from high-pressure sodium (HPS) lamps to LEDs, and some communities plan to upgrade interior lights to LEDs.

The Northwest Arctic Borough (NWAB) has conducted a study on interior and exterior LED lighting use and quality for cold regions. The LEDway Beta™ exterior street lights have performed well by the NWAB standards, are *Buy America* compliant, and are available through a local vendor in Anchorage, Alaska. More information on the LEDway streetlights is available here:

<http://www.ledwaystreetlights.com/education-buy-american.html>

<http://www.betaled.com/us-en/Home.aspx>

In addition, the Lighting Design Lab has conducted a study comparing various street lights, including the following LEDs that have been confirmed *Buy American*-compliant, *unless otherwise indicated*. A PowerPoint summary of the study is located at

http://www.lightingdesignlab.com/articles/LED_fund/LED_street_lights.pdf.

- IntenSity LED street light – *not confirmed*
- LeoTEK LED street light - The Green Cobra is expected to be *Buy American-compliant* by June 2010. Contact www.leotek.com for more information
- ReLume R20 LED street light - *Buy American-compliant*
- Beta Edge LED street light - *Buy American-compliant*
- Beta LEDway LED street light – *Buy American-compliant*
- SOL LED street light - *not confirmed*

The street lights indicated above may not be the only Buy American-compliant option. Others are acceptable as long as they meet the requirement.

NWAB has also reviewed *interior* lighting options. However, since LEDs have not yet been proven competitive with linear fluorescent lamps for indoor use we have not identified sources for interior LED lights.

Other links:

<http://www.bodine.com/> - Buy-American compliant LED Emergency Lights that have not been purchased or reviewed by NWAB

<http://www.daybritelighting.com/brochures/647.pdf> - this guide includes a list of Phillips products (emergency LEDs) and whether or not they comply with Buy American

<http://www.cooperindustries.com/products/> - web site indicates Buy American-compliant products are available. You will need to confirm that your specific product complies.

How can I confirm that the product we want to buy meets the Buy American requirement?

Identifying Buy American compliant products can be difficult. A good approach includes a “due diligence” effort to confirm the product complies:

- Some manufacturer and/or distributor web sites include lists of Buy American-compliant products. Be careful reviewing the web site, as language can be confusing. If the web site clearly states that **all** their products comply, then copy that web page and statement to your file.
- If a product web site does not clearly state that **all** products meet the requirement, contact the manufacturer and request e-mail or other written verification that the product complies. For example, Cooper Lighting (<http://www.cooperindustries.com/markets/stimulus/>) indicates that Buy America products are available. Be sure to confirm that the exact product you want to purchase complies.
- Be certain to back up verbal confirmation with written documentation.

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